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March 17, 2014

**BY ECF**

Honorable Roanne L. Mann  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Bobb v. Philipose, et al.*, 13 CV 5583 (ARR) (RLM)

Your Honor:

I represent plaintiff in the above-referenced matter. I write to respectfully request an extension of the deadline to file an amended complaint and add new parties from March 24, 2014 until April 21, 2014. Defense counsel consents to this application.

At the initial conference held on January 24, 2014, the Court set a deadline of March 24<sup>th</sup> for plaintiff to file an amended complaint adding additional parties. Document discovery has revealed that as many as seven officers, in addition to defendant Philipose, may have participated in plaintiff's apprehension and arrest. Plaintiff intends to add these officers as defendants and the parties have been working to identify them. However, there has been some delay in defendant's procurement of the roll call and Sprint report, documents that are critical to the identification process. Defense counsel has indicated that these documents have been requested and are expected shortly. Once these documents are produced, along with the command log, memo books and officer photographs, all of which were requested in plaintiff's discovery demands and expected shortly, plaintiff should be in a position to identify the correct officers and file an amended complaint naming them as defendants.

Accordingly, plaintiff respectfully requests an extension of the deadline to file an amended complaint and add new parties from March 24, 2014 until April 21, 2014.

Thank you for your consideration of this request.

Respectfully submitted,



Gabriel P. Harvis

cc: Vicki B. Zgodny, Esq.